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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANT OTTO TRUCKING'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
MOTION TO COMPEL**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion
7 to File Under Seal Portions of Its Motion to Compel (the “Administrative Motion”). The
8 Administrative Motion seeks an order sealing highlighted portions of Otto Trucking’s Letter Brief re
9 Motion to Compel (“Otto Trucking’s Motion”) and of Exhibits 1-2 to the Boock Declaration (“Boock
10 Exhibits”), as well as the entirety of 7 and 9-10 to the Jennings Declaration (“Jennings Exhibits”).

11 3. The entirety of Jennings Exhibit 7 contains, references, and/or describes Waymo’s
12 highly confidential and sensitive business information. Such information includes details regarding
13 Waymo’s security measures and protocols, the scope of forensic investigations conducted, and
14 detailed computer forensics regarding access to Waymo’s trade secrets. I understand that Waymo
15 maintains this information as confidential. The public disclosure of this information would cause
16 significant competitive harm to Waymo, as its security measures and computer forensics methods
17 would become known to competitors who could use such information to Waymo’s disadvantage. In
18 addition, this document discloses the actual workings of Waymo’s forensic investigation and was
19 prepared solely by attorneys and investigators. This document lays out in detail the potential scope of
20 the internal investigation into Levandowski and others. It details the highly confidential thinking of
21 the attorneys and investigators charged with the investigation. Disclosure of this document will reveal
22 these detailed thoughts and plans to the potential harassment of those involved. This sealing request is
23 consistent with requests previously granted by the Court. (*See, e.g.*, Dkt. 1444.)

24 4. Jennings Exhibit 9 (portions highlighted in green in version filed herewith) contain
25 email addresses and/or phone numbers of Waymo employees and former employees involved in this
26 case, the disclosure of which would cause Waymo and those employees substantial harm due to the
27 high public profile of this litigation.

5. Jennings Exhibit 10 (portions highlighted in green in version filed herewith) contains, discusses, or refers to confidential details regarding prototype development and testing of Kitty Hawk and/or related entities, which Waymo understands are highly confidential to Kitty Hawk, and disclosure of such information would inflict serious and irreparable damage to Kitty Hawk's business. (*See* Dkt. 1115 ¶ 3.)

6. Waymo's request to seal is narrowly tailored to those portions of Jennings Exhibits 7 and 9-10 that merit sealing.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed in San Francisco, California, on September 5, 2017.

By /s/ *Felipe Corredor*

Felipe Corredor
Attorneys for WAYMO LLC

ATTESTATION

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from Felipe Corredor.

By: /s/ Charles K. Verhoeven

Charles K. Verhoeven